

In the matter of

MB Docket No. 04-207

**A La Carte and Themed Tier
Programming and Pricing Options
For Cable Programming**

COMMENTS OF

Michigan Government Television (MGTV)
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I, William C. Trevarthen, file these comments on behalf of Michigan Government Television in my capacity as MGTV's executive director on June 22, 2004, in response to the FCC's Notice of Proposed Rule Making in the matter of *A La Carte* and Themed Tier Programming and Pricing Options for Programming on Cable and Direct Broadcast Satellite Systems, MB Docket No. 04-207.

COMMENTS: Michigan Government Television (MGTV), a non-profit cable television network covering state government, would very likely suffer serious damage if the FCC or Congress were to force cable and satellite providers to offer programming on an *a la carte* basis.

Like the national C-SPAN cable networks, MGTV was created by the cable industry itself as a public service to its subscribers. MGTV offers live and tape delayed coverage of all branches of Michigan's state government, including House and Senate sessions and committees, oral arguments before Michigan's Supreme Court, and events from the executive branch, without editing for content or commentary. We are supported entirely by subscription fees. We do not and would not accept paid advertising...an important policy matter for us. Reliance on revenue from advertising could jeopardize our ability to provide balanced, non-partisan coverage of state government free from outside influence or political demands.

As the cable industry has effectively argued in its policy papers, *a la carte* will reduce program diversity. Many networks, particularly niche networks that target small, underserved audiences, would not be able to

attract enough subscribers to survive. Although MGTV's programming is aimed at a fairly high percentage of Michigan's cable subscribers, our actual viewing audience is not large. We realize that unedited coverage of legislative sessions and committees is not highly attractive from an entertainment standpoint. However, it is invaluable to the people of this state because it opens up what had previously been unavailable to the majority of our citizens: unedited access to the important state decision-making process. A majority of our subscribers may not turn to us as often as they would ESPN or CNN, but I think we can safely say that a great many of them do rely on us when issues that affect them are working their way through the legislature or the courts.

MGTV is one of many state public affairs networks in the U.S. that are supported and distributed by cable television. Forcing an *a la carte* model on the cable and satellite industries could effectively silence our voices. For that reason I am opposed to forcing any *a la carte* programming model on the cable and satellite industries.

Submitted by

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